

## Remarks

The Applicant respectfully requests reconsideration of the present U.S. Patent application as amended herein. Claims 1, 11, and 16 have been amended. No claims have been added, cancelled or withdrawn in this amendment. Thus, claims 1-22 remain pending in the application.

### Claim Rejections § 103

Claims 1, 5-9, 11-13, and 15-21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over published U.S. Patent Application No. 2003/0112808 filed by Solomon (*Solomon*) in view of U.S. Patent No. 5,848,243 issued to Kulkarni (*Kulkarni*). The Applicant respectfully submits that claims 1, 5-9, 11-13, and 15-21 are not anticipated by *Solomon* for at least the reasons set forth below.

The Manual of Patent Examining Procedure (“MPEP”), in § 2131, states:

“A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *Verdegaal Bros. V. Union Oil Co. California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). “The identical invention must be shown in as complete detail as is contained in the ... claim.” *Richardson v. Suzuki Motor Co.*, 869 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Thus, under 35 U.S.C. § 102, a claim is anticipated *only if* each and every element of the claim is found in the cited reference and the cited reference must show the invention in as complete detail as contained in the claim.

Amended claim 1 recites:

A method for describing a network comprising:

programmatically categorizing a subnet into a subnet grouping based, at least in part, on whether the subnet is an internal subnet or an external subnet, wherein the internal subnet is associated with a secure interface of a firewall and the external subnet is associated with a non-secure interface of a firewall, wherein subnets within a subnet grouping can route to one another;

providing a subnet subsection for the subnet within the categorized subnet grouping;

specifying a network topology type in the provided subnet subsection, the network topology type to indicate a network topology that is to be supported by the subnet; and

providing a network configuration request, the network configuration request including the subnet subsection and the network topology type, wherein the network configuration request specifies a requested configuration for the network and further wherein one or more network components are to be configured responsive to the network configuration request.

(Emphasis added.)

Amended claims 11 and 16 are, respectively, network and article claims that similarly recite, “providing a network configuration request, the network configuration request including the subnet subsection and the network topology type, wherein the network configuration request specifies a requested configuration for the network and further wherein one or more network components are to be configured responsive to the network configuration request.”

The Office action directs the Applicant’s attention to various passages of *Solomon*. *Solomon* is directed to “automatically compiling ... a configuration- or mapping table of all the external subnets within the net with which it ... actively communicates through the WAN (see, e.g., [0023] of *Solomon*). As used in *Solomon*, the term “local subnets” refers to “subnets within a local LAN” (see, e.g., [0023] of *Solomon*) and the term “remote subnets” refers to “all other LANs” (see, e.g., [0023] of *Solomon*).

The Applicant respectfully notes that the cited passages of *Solomon* do not disclose “specifying a network topology type in the provided subnet subsection, the

network topology type to indicate a network topology that is to be supported by the subnet ... or providing a network configuration request, the network configuration request including the subnet subsection and the network topology type, wherein the network configuration request specifies a requested configuration for the network.” In addition, *Solomon* does not disclose that an “internal subnet is associated with a secure interface of a firewall and ... [an] external subnet is associated with a non-secure interface of a firewall.” For at least the above stated reasons, the Applicant respectfully submits that claims 1, 11, and 16 are patentable over *Solomon*.

The Office action states that *Solomon* fails to disclose “providing a network configuration request, the network configuration request including the subnet subsection and the network topology type, wherein the network configuration request specifies a requested configuration for the network.” Regarding the claim elements directed to the “network configuration request,” the Office action directs the Applicant’s attention to selected portions of *Kulkarni*. The cited portions of *Kulkarni*, however, merely discuss “monitoring” and “creat[ing] ... views.” They do not discuss providing a network configuration request that causes one or more network components to be configured. For example, the cited passages of *Kulkarni* state “[t]he typical user will then monitor only those devices, reducing the number of managed objects to create and monitor.” For at least the reason that *Kulkarni* does not teach or suggest “providing a network configuration request, the network configuration request including the subnet subsection and the network topology type, wherein the network configuration request specifies a requested configuration for the network and further wherein one or more network

components are to be configured responsive to the network configuration request,” it cannot cure the deficiencies of *Solomon*.

Claims 2-10 depend from claim 1. Claims 12-15 depend from claim 11. Claims 17-22 depend from claim 16. For at least the reason that dependent claims include the limitations of the claims from which they depend, the Applicant respectfully submits that claims 2-10, 12-15, and 17-22 are not anticipated by *Solomon*.

### Claim Rejections § 103

Claims 2-4, 10, 14, and 22 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Solomon* in view of *Kulkarni* in further view of published U.S. Patent Application No. 2003/0106067 filed by Hoskins (*Hoskins*). The Applicant respectfully submits that claims 2-4, 10, 14, and 22 are patentable over *Solomon*, *Kulkarni*, and *Hoskins* for at least the reasons set forth below.

As shown above, *Solomon* and *Kulkarni* fail to teach or suggest, “providing a network configuration request, the network configuration request including the subnet subsection and the network topology type, wherein the network configuration request specifies a requested configuration for the network and further wherein one or more network components are to be configured responsive to the network configuration request,” as recited in claims 1, 11, and 16. *Hoskins* is cited as teaching that the subnet is to be supported by specific network standards. Whether or not *Hoskins* discloses the limitations cited by the Office action, it does not teach or suggest the above cited claim limitations of claims 1, 11, and 16. Because *Solomon*, *Kulkarni*, and *Hoskins* do not teach or suggest the above-cited claim limitations, no combination of *Solomon*, *Kulkarni*,

and *Hoskins* teaches or suggests the invention as claimed in claims 1, 11, and 16. Thus, Applicants respectfully submit that dependent claims 1, 11, and 16 are not rendered obvious by *Solomon* in view of *Hoskins*.

Claims 2-4 and 10 depend from claim 1. Claim 14 depends from claim 11. Claim 22 depends from claim 16. For at least the reason that dependent claims include the limitations of the claims from which they depend, the Applicant respectfully submits that claims 2-4, 10, 14, and 22 are patentable over *Solomon* in view of *Hoskins*.

### **Conclusion**

The Examiner is respectfully requested to contact the undersigned by telephone if such contact would further the examination of the present application.

Respectfully submitted,

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